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**From:** Mills, Kathy [Mills.Kathy@epa.gov]  
**Sent:** 3/27/2018 7:27:36 PM  
**To:** Thompson, Lisa [Thompson.Lisa@epa.gov]  
**Subject:** RE: Heads up: 4/3 GPA Midstream meeting w/Mandy

You're awesome, thank you.

Kathy "KB Mills ~ SPPD ~ U. S. EPA, OAQPS ~ 919-541-1599

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**From:** Thompson, Lisa  
**Sent:** Tuesday, March 27, 2018 3:24 PM  
**To:** Mills, Kathy <Mills.Kathy@epa.gov>  
**Subject:** RE: Heads up: 4/3 GPA Midstream meeting w/Mandy

The white paper is 70 pages so let me help out a bit more. Their main issues are:

- Exempt third party equipment (midstream equipment) from the fugitive requirements at well sites
- Delay of repair (addressed in amendments package)
- Reduce monitoring frequency at compressor stations to annual (provided leak rate data to support this, we disagree that it leads to this conclusion, but haven't discussed that with them)
- Reduce burden associated with the monitoring plan
- Want us to clarify that VRU compressors don't trigger OOOOa
- Revise the capital expenditure equation

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**From:** Thompson, Lisa  
**Sent:** Tuesday, March 27, 2018 3:03 PM  
**To:** Mills, Kathy <Mills.Kathy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>  
**Subject:** RE: Heads up: 4/3 GPA Midstream meeting w/Mandy

GPA was here on 2/7 to discuss the issues in their white paper (attached). They followed up with data on leak rates from compressor stations (attached) and at our request they met to discuss this data on 3/15. Hope this helps you get started! I wouldn't worry about docketed comments at this point – the white paper covers their main issues I expect they'll discuss with Mandy.

Thanks!

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**From:** Mills, Kathy  
**Sent:** Tuesday, March 27, 2018 1:42 PM  
**To:** Thompson, Lisa <Thompson.Lisa@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>  
**Subject:** Heads up: 4/3 GPA Midstream meeting w/Mandy

L/K

Penny and David are on the meeting invite. We have not been asked for a pager yet but I would expect we will so wanted to get this on your radar. I'm happy to start a draft to include:

- docketed comments
- any meetings w/O&G staff
- what else?

EPA's regulatory path forward for Quad C's of EPA's New Source Performance Standards is of critical importance to GPA Midstream's members. As such, we have requested a meeting with Amandy to present our views -- but would ask whether it would be possible for us to meet with Bill Wehnum as well.

Our proposed attendees are:

Matt Kitz, VP of Government Affairs, GPA Midstream  
Adrienne Sandoval, Andeavor (GPA Midstream member)  
Sam Bowerman, Sidley Austin LLP (outside counsel for GPA Midstream)

If you need anything further from me, please let me know.

Kathy "KB Mills ~ SPPD ~ U. S. EPA, OAQPS ~ 919-541-1599